

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ARIGNA TECHNOLOGY LTD.,

Plaintiff,

v.

GENERAL MOTORS LLC, ET AL.

Defendants.

Case No. 2:21-cv-00174-JRG

JURY TRIAL DEMANDED

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Pursuant to this Court's Standing Order Regarding Proper Notification of Settlement to the Court, a settlement in principle has been reached that resolves all matters in controversy between Plaintiff Arigna Technology Ltd., ("Plaintiff") and Defendant General Motors LLC ("GM") in the above-entitled and numbered action, but additional time is needed to complete certain prerequisites to dismissal. Accordingly, GM and Arigna respectfully request that the Court stay all pending deadlines between them for 30 days, up to and including June 19, 2022. Plaintiff and GM request this stay not for purposes of any delay, but so that they may finalize and file dismissal papers¹ without incurring additional expenses. This requested stay applies only to GM and does not impact Arigna's ongoing action against the Nissan defendants.

If the Court grants GM and Arigna's request for a stay, certain motions that are pending between Arigna and GM only (which do not concern the Nissan defendants) will not require adjudication by the Court. Those motions are listed in the table below:

¹ GM and Arigna agree that the dismissal papers would provide that Arigna dismiss the action against GM with prejudice and that both parties would bear their own costs and fees.

Docket No.	Motion
Dkt. 163	Arigna's Motion to Exclude Opinions of Lance Gunderson
Dkt. 170	GM's <i>Daubert</i> Motion to Exclude Expert Opinions of David E. Yurkerwich

Dated: May 23, 2022

Respectfully submitted,

/s/ Marissa Ducca

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CERTIFICATE OF SERVICE

The undersigned certifies that on May 23, 2022 a true and correct copy of the foregoing document was served on all attorneys of record who have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Matthew R. Berry _____

Matthew R. Berry

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Arigna has met and conferred with counsel for GM regarding the relief sought in this Motion on May 20, 2022. Counsel for defendants GM agreed to and joined this motion.

/s/ Matthew R. Berry _____

Matthew R. Berry